

From: [Rafael Casanova](#)  
To: [Gloria-Small Moran](#)  
Cc: [Chuck Talton](#); [Gary Moore](#); [Gustavo Chavarria](#)  
Subject: Re: Falcon Refinery - Phone call from Steve Halasz, contractor  
Date: 10/02/2003 01:52 PM

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Gloria, please forward the following responses, to Halasz's e-mail, to the PRP or the PRP's contractor. Thanks.

**Halasz indicated the following:**

1. There are more than 100 samples taken by TCEQ in the wetlands.
2. The data from the samples is not indicative that more sampling is needed (at this time).

**EPA's Response:**

1. There were **not** more than 100 samples taken by TCEQ in the wetlands. There were a total of about 38 sediment samples taken. Ten were from Redfish Bay along the Intracoastal Waterway, four were background samples away from the facility, approximately five were duplicate samples, and only about 19 samples were taken from Probable Points of Entry (PPE) of contaminants in the wetland areas to the southeast and east of the Site. This sampling scheme and number of samples are only appropriate for the ranking of the Site. This sampling scheme is not appropriate for purposes of the RI for the Site.
2. PPE sample analyses indicate the presence of organic and inorganic contaminants in the nearshore wetland areas. These samples are only representative of the PPE and do not characterize the full extent of possible contamination in the wetland areas. The determination of the **full** vertical and horizontal extent of contamination will be determined during the RI for the Site. The sampling scheme will be developed during the scoping of the RI and the development of the Field Sampling Plan (FSP) and Quality Assurance Project Plan (QAPP), taking into consideration the available data and other possible surrounding sources.

**Halasz's Request:**

Halasz wondered whether you conferred with a group (peer group) about the timing and number of samples required.

**EPA's Response:**

EPA will confer with the EPA's sediment experts, including the state and federal natural resource trustees, during the scoping of the RI and development of the FSP and QAPP concerning the sampling scheme, required number of samples, and target analytes, taking into consideration the available data and other possible surrounding sources.

The question of timing is irrelevant to this discussion. The wetland areas will be investigated concurrently with the removal action since contaminants have already been discovered in the near-shore wetland areas and the full vertical and horizontal extent and concentrations of contaminants still need to be determined. Additionally,



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shallow ground water, already known to be contaminated, may already be contributing to the contamination in the wetland areas. There are known and observed releases to the wetland areas. The RI/FS for the sediments, surface water, and ground water (Operable Unit 1 or Areas of Concern) can be accomplished without waiting for the physical removal of any refinery equipment, etc., and/or any associated visibly contaminated soils (Operable Unit 2).

**Halasz's Requested Action:**

What, if any, peer review occurs involving specific sampling protocols? Do you confer with any peer group about the manner of sampling?

**EPA's Response:**

EPA will confer with the EPA's sediment experts, including the state and federal natural resource trustees, during the scoping of the RI and development of the FSP and QAPP concerning the sampling scheme, required number of samples, and target analytes, taking into consideration the available data and other possible surrounding sources.

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**Assigned Sites:**

Brine Service Company Superfund Site (Corpus Christi, Texas) -  
<http://www.epa.gov/earth1r6/6sf/pdf/brine.pdf>  
Falcon Refinery Site (Ingleside, Texas) -  
<http://www.epa.gov/earth1r6/6sf/pdf/falcon.pdf>  
Many Diversified Interests, Inc. Superfund Site (Houston, Texas) -  
<http://www.epa.gov/earth1r6/6sf/pdf/mdi.pdf>  
Star Lake Canal Superfund Site (Port Neches, Texas) -  
<http://www.epa.gov/earth1r6/6sf/pdf/starlake.pdf>

▼ **Gloria-Small Moran**

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To: Rafael Casanova/R6/USEPA/US@EPA  
cc: Gary Moore/R6/USEPA/US@EPA, Chuck  
Talton/R6/USEPA/US@EPA  
Subject: Falcon Refinery - Phone call from Steve Halasz,  
contractor

09/24/2003  
06:11 PM

Hello Rafael,

I received a phone call from Steve Halasz, contractor for NORCO, concerning the same issue that he raised in the meeting last Thursday. He talked about the wetlands, and wondered, again, whether sampling could occur after the facility is torn down. Halasz again was concerned about the number of samples that would be required by EPA, and the cost associated with each sample (approximately \$100,000).

Halasz indicated the following:

1. There are more than 100 samples taken by TCEQ in the wetlands.
2. The data from the samples is not indicative that more sampling is needed (at this time).

I informed him that you had indicated:

1. The number of samples would be decided in discussions between EPA and the contractor during the scoping of the sampling.
2. That you would be "reasonable" in requesting samples, and that a grid on the entire wetland would not be required.

His request:

Halasz wondered whether you conferred with a group (peer group) about the timing and number of samples required.

My response:

You ultimately answered to Myron Knudson, but that you also conferred with your managers and others about the sampling protocol to ensure consistency across sites.

Action:

What, if any, peer review occurs involving specific sampling protocols? Do you confer with any peer group about the manner of sampling?

I told Halasz that either you or I would get back to him with a response. (He is not suggesting that he speak personally with a peer group about this site).

Thanks and let me know.

Gloria  
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